

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

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v.

**Case No. 4:22-cr-612**

**CONSTANTINESCU, *et al.***

**The Honorable Andrew S. Hanen**

**Defendants.**

§

**United States' Motion to Post Information under the Crime Victims' Rights Act**

The United States, by and through its undersigned counsel, respectfully requests that the Court to authorize the Department of Justice to post the information in Exhibit 1 to this Motion (“Proposed Post”) so that the undersigned attorneys may comply with their obligations under the Crime Victims’ Rights Act (“CVRA”), 18 U.S.C. § 3771. The Court, upon granting in part the opposed motion of the United States (ECF No. 120), had previously ordered that such postings must first be “presented to counsel for Defendants and approved by the Court in advance of posting.” (ECF No. 188.)

Pursuant to the Court’s Order, the United States presented the Proposed Post to defense counsel. Counsel for Defendants Constantinescu, Matlock, Rybarczyk, Deel, Hrvatin, and Hennessey oppose the Proposed Post. Counsel for the remaining Defendants did not provide to the undersigned attorneys a position by the time of this filing.

The United States respectfully requests that the Court authorize the Proposed Post so that the undersigned attorneys may carry out their obligations under the CVRA. If the Proposed Post is approved by the Court, the United States also respectfully requests that the Court authorize the Department of Justice to update the Proposed Post with future docketed events in this case, to include the event, date, time and location, so that these events may be publicly noted without delay.

A proposed Order is attached.

Dated: March 7, 2023

Respectfully submitted,

GLENN S. LEON  
Chief, Fraud Section  
Criminal Division, Department of Justice

By: /s/John J. Liolos  
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**CERTIFICATE OF SERVICE**

I hereby certify that counsel for the United States conferred with counsel for the defendants about the relief requested. Counsel for Defendants Constantinescu, Matlock, Rybarczyk, Deel, Hrvatin, and Hennessey oppose the Proposed Post. Counsel for the remaining Defendants did not provide to the undersigned attorneys a position by the time of this filing.

*/s/ John J. Liolos*  
John J. Liolos, Trial Attorney  
U.S. Department of Justice  
Criminal Division, Fraud Section

**CERTIFICATE OF SERVICE**

I hereby certify that on March 7, 2023, I will cause the foregoing motion to be electronically filed with the Clerk of the Court using the CM/ECF system, which will provide copies to counsel for all parties.

*/s/ John J. Liolos*  
John J. Liolos, Trial Attorney  
U.S. Department of Justice  
Criminal Division, Fraud Section